

### **REMARKS**

This is a full and timely response to the non-final Office Action of May 3, 2005.

Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

Upon entry of this Second Response, claims 1-23 are pending in this application. Claim 1 is directly amended herein. It is believed that the foregoing amendment adds no new matter to the present application.

### **Response to §103 Rejections**

In order for a claim to be properly rejected under 35 U.S.C. §103, the combined teachings of the prior art references must suggest all features of the claimed invention to one of ordinary skill in the art. See, *e.g.*, *In Re Dow Chemical Co.*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). In addition, “(t)he PTO has the burden under section 103 to establish a *prima facie* case of obviousness. It can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references.” *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988) (Citations omitted).

## Claim 1

Claim 1 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* (U.S. Patent No. 6,339,826) in view of *Boroughs* (6,834,350). Claim 1 presently reads as follows:

1. A computer system, comprising:  
memory; and  
a security application configured to display a list of security rules for locking down resources of said computer system, said security application configured to enable a set of said security rules, based on inputs from a user, and to cause said computer system to enforce said enabled set of security rules by modifying a machine state of said computer system, ***said security application further configured*** to enable said user to select one of said security rules and ***to display information describing said selected rule in response to a selection of said one rule from said displayed list by said user***, said information based on data stored in said memory. (Emphasis added).

Applicants respectfully assert that the combination of *Hayes* and *Boroughs* fails to suggest at least the features of claim 1 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 1 is improper.

In rejecting claim 1, it is candidly admitted in the Office Action that *Hayes* fails to disclose “said security application further configured to enable said user to select one of said security rules and to display information describing said selected rule in response to a selection of said one rule by said user.” However, it is then alleged in the Office Action that *Boroughs* teaches such features of claim 1 at column 9, lines 47-58.

The cited section of *Boroughs* appears to disclose the display of “essential information” 2101, 2202, 2303 and “additional information” 2113. However, there is nothing in *Boroughs* to suggest that either the “essential information” or the “additional information” is displayed in response to a selection of a security rule from a displayed list of security rules. In fact, Applicants observe that column 9, lines 47-58 fails to even disclose a “displayed list of security rules.” In this regard, the cited section of *Boroughs* discloses an icon 2111 representing “security rules.” See

Figure 21 and column 9, lines 47-58. However, an icon, in its ordinary meaning, is not a “list,” and the display of the icon 2111 in *Boroughs* does not constitute a “displayed list” of security rules.

Further, even if the icon 2111 is somehow construed to constitute a “displayed list” of security rules, there is nothing to indicate that either the “essential information” or the “additional information” in *Boroughs* is displayed *in response to a selection* of the icon 2111 or any of the “security rules” represented by the icon 2111. In this regard, the “essential information” and an icon 2113 representing the “additional information” appear to be displayed *along with* the icon 2111 representing the alleged “security rules.” See Figure 21. There is no suggestion in *Boroughs* for the “essential information” or the “additional information” icon 2113 to be displayed in response to selection of the icon 2111 or any of the “security rules” represented by the icon 2111. Further, the “additional information” represented by the icon 2113 apparently would be displayed in response to selection of this icon 2113, not in response to selection of icon 2111 or any of the “security rules” represented by the icon 2111.

For at least the above reasons, Applicants respectfully assert that the Office Action fails to establish that the combination of *Hayes* and *Boroughs* suggests a “security application configured to... display information describing said selected rule *in response to a selection of said one rule from said displayed list by said user*,” as described by claim 1. (Emphasis added). Accordingly, the Office Action fails to establish a *prima facie* case of obviousness with respect to claim 1, and the 35 U.S.C. §103 rejection of this claim should be withdrawn.

Additionally, “(w)hen the patented invention is made by combining known components to achieve a new system, the prior art must provided a suggestion or motivation to make such a combination.” *ALCO Standard Corp. v. Tennessee Valley Authority*, 808 F.2d 1490, 1498, 1 U.S.P.Q.2d 1337, 1343 (Fed. Cir. 1986). Moreover, in rejecting claim 1, it is asserted in the Office Action that:

“It would have been obvious to one of ordinary skill in the art at the time the invention was made for the security application to be configured to enable said user to select one of said security rules and to display information describing said selected rule in response to a selection of said one rule by said user, since *Boroughs* states at column 2, lines 47-58 that such a modification would provide information as to what rules applies to which application and let a user promptly review and act on the rule.”

However, there is no cited deficiency in *Hayes* to motivate one of ordinary skill in the art to seek the alleged benefits described by *Boroughs*. Thus, the proffered reasons for combining *Hayes* and *Boroughs* are insufficient for establishing a *prima facie* case of obviousness. Indeed, where there is no apparent disadvantage present in a particular prior art reference, then generally there can be no motivation to combine the teaching of another reference with the particular prior art reference. *Winner Int'l Royalty Corp. v. Wang*, 202 F.3d 1340, 1349, 53 U.S.P.Q.2d 1580 (Fed. Cir. 2000). Thus, even if the alleged combination teaches all features of pending claim 1, as alleged in the Office Action, Applicants respectfully assert that the combination of *Hayes* and *Boroughs* is improper, and the 35 U.S.C. §103 rejection of claim 1 should be withdrawn for at least this reason.

#### **Claims 2-7 and 19-22**

Claims 2-7 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs*. Further, claims 19-22 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs* and in further view of *Deo* (U.S. Patent No. 5,720,033). Applicants submit that the pending dependent claims 2-7 and 19-22 contain all features of their respective independent claim 1. Since claim 1 should be allowed, as argued hereinabove, pending dependent claims 2-7 and 19-22 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### Claim 8

Claim 8 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs*. Claim 8 presently reads as follows:

8. A computer system, comprising:  
means for displaying a list of security rules for locking down resources of said computer system;  
means for receiving inputs from a user of said computer system;  
means for enabling a set of said security rules based on said inputs from said user;  
means for enforcing said enabled set of security rules;  
***means for selecting one of said security rules from said displayed list; and***  
***means for displaying information describing said selected rule in response to a selection of said one rule by said selecting means.*** (Emphasis added).

For reasons similar to those set forth hereinabove in the arguments for allowance of claim 1, Applicants respectfully submit that the combination of *Hayes* and *Boroughs* fails to suggest at least the features of claim 8 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 8 is improper and should be withdrawn.

### Claim 9

Claim 9 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs*. Claim 9 presently reads as follows:

9. A method for locking down resources of computer systems, comprising the steps of:  
displaying a list of security rules for locking down resources of a computer system;  
receiving inputs from a user of said computer system;  
enabling a set of said security rules based on said inputs from said user;  
enforcing said enabled set of security rules;  
***selecting one of said security rules from said displayed list; and***  
***displaying information describing said selected rule in response to said selecting step.*** (Emphasis added).

For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicants respectfully assert that the combination of *Hayes* and *Boroughs* fails to suggest at least the features of claim 9 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 9 should be withdrawn.

### **Claims 10-18**

Claims 10-15 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs*. Further, claims 16-18 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs* and in further view of *Deo*. Applicants submit that the pending dependent claims 10-18 contain all features of their respective independent claim 9. Since claim 9 should be allowed, as argued hereinabove, pending dependent claims 10-18 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Claim 23**

Claim 23 presently stands rejected under 35 U.S.C. §103 as allegedly unpatentable over *Hayes* in view of *Boroughs*. Claim 23 presently reads as follows:

23. A computer-readable medium having a program, the program comprising:  
    logic for displaying a list of security rules;  
    logic for enabling a set of said security rules, based on inputs from a user;  
    logic for causing a computer system to enforce said enabled set of security rules;  
    ***logic for enabling a user to make a selection of one of said security rules while said list of security rules, including said one security rule, is being displayed; and***  
    ***logic for displaying information describing said selected rule in response to said selection.*** (Emphasis added).

For at least the reasons set forth hereinabove in the arguments for allowance of claim 1, Applicants respectfully assert that the combination of *Hayes* and *Boroughs* fails to suggest at least the features of claim 23 highlighted above. Accordingly, the 35 U.S.C. §103 rejection of claim 23 should be withdrawn.

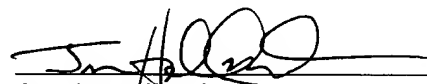
### **CONCLUSION**

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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